



EPA Review of "Sampling and Analysis Plan for Trenches 31 and 34 of the 218-W-5 Burial Ground," HNF-23614, Revision 0

Dave Bartus to: Skinnarland, Ron (ECY), Singleton, Deborah (ECY)

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Cc: "Conaway, Kathy (ECY)"

Ron and Deb:

I've completed a first-pass review of the document HNF-23614 provided during the Hanford inspection of Trenches 31 and 34. I've reviewed the document from both a technical perspective, and as it relates to the existing Dangerous Waste component of the Hanford RCRA permit. I've previously provided these comments to the NEIC inspection team for their consideration in their inspection report, but would also like to provide them to Ecology directly regarding on-going program implementation and Ecology follow-up.

While the facility is managing the Trench 31/34 leachate collection activities under the generator accumulation standards of WAC 173-303-200, there is a clear nexus to permit requirements, as information concerning Trench 31/34 leachate collected under this WAP can reasonably be expected to be used to satisfy LERF/ETF waste acceptance criteria. As you can see from the comments, there are both technical concerns with the waste analysis requirements, and disconnects between analysis conducted under this WAP, and waste acceptance requirements in the dangerous waste permit.

I'll be happy to provide further assistance with any questions you may have.

Dave



EPA Region 10 Review Comments LERF ETF Leachate Sampling and Analysis Plan.docx